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16 *Corporation*

17 **UNITED STATES DISTRICT COURT**
18 **DISTRICT OF NEVADA**

19 BOSTON HEART DIAGNOSTICS
20 CORPORATION,

21 Plaintiff,

22 vs.

23 MD LABS, INC.

24 Defendant.

Case No.: 3:18-cv-00006

**STIPULATION TO EXTEND DEADLINE
FOR PLAINTIFF TO FILE RESPONSE
TO DEFENDANT'S MOTION TO
DISMISS**

(FIRST REQUEST)

25 Pursuant to LR 6-1 and LR 26-4, undersigned Plaintiff and Defendant hereby submit
26 the following stipulation and proposed order extending the deadline for Plaintiff Boston Heart
27 Diagnostics Corporation ("Plaintiff") to file a Response to *Defendant's Motion to Dismiss First*
28 *Amended Complaint Under Fed. R. Civ. P. 12(b)(6) and Memorandum in Support*, filed March
27, 2018. *See* ECF No. 37 ("Motion to Dismiss"). Pursuant to this Stipulation, Defendant's
counsel has agreed that Plaintiff shall have up to and including April 17, 2018 to file its

1 Response.

2 The following is stated in support of this Stipulation:

3 1. On March 27, 2018, Defendant filed its Motion to Dismiss. ECF No. 37.

4 2. The current deadline for Plaintiff to file a response to the Motion to Dismiss is
5 April 10, 2018.

6 3. The undersigned Parties have agreed the deadline for Plaintiff's Response to
7 Defendant's Motion to Dismiss shall be extended until April 17, 2018.

8 4. This extension will not interfere with or delay the oral argument set for May
9 22, 2018 on this matter, because briefing will still be completed four weeks in advance of that
10 hearing date. See ECF No. 39.

11 5. Additionally, no schedule has been set in this matter, and therefore this
12 extension will not interfere with any scheduled dates.

13 Undersigned counsel for Plaintiff respectfully submits good cause exists and requests
14 the Court grant the requested extension.

15 WHEREFORE, Plaintiff and Defendant request entry of an Order granting an
16 extension for Plaintiff to file its Response to Defendant's Motion to Dismiss until and
17 including April 17, 2018.

18 DATED: April 9, 2018

19 **HUMPHREY LAW PLLC**

20 **PERKINS COIE LLP**

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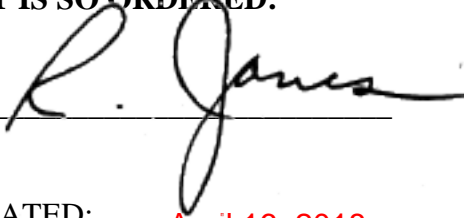
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12 *Diagnostics Corporation*

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Attorneys for MD Labs, Inc.

13 **IT IS SO ORDERED:**

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17 DATED: ____ April 16, 2018.
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